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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FERN C. PALMER; PAMELA K. MARXEN; KURT
B. PALMER; and BRUCE N. PALMER; ESTATE OF
BOYER PALMER, in its capacity as the estate of
Boyer Palmer individually and as the former general
partner of B&F Palmer, L.P.; DIANE HOLMERS, in
her capacity as Personal Representative of the Estate of
Boyer Palmer; and BRUCE PALMER, in his capacity
as Personal Representative of the Estate of Boyer
Palmer,

Defendants.

Adv. Pro No. 10-05133 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants Estate of Boyer Palmer, in its capacity as the former general partner of B&F Palmer, L.P.; Diane Holmers, in her capacity as Personal Representative of the Estate of Boyer Palmer; and Bruce Palmer, in his capacity as Personal Representative of the Estate of Boyer Palmer (“Defendants”).

2. I submit this Declaration in support of Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 2, 2010 [ECF No. 1].

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants’ Answer and Affirmative Defenses, dated September 17, 2015 [ECF No. 41].

Dated: New York, New York
March 8, 2021

/s/ Helen Davis Chaitman
Helen Davis Chaitman